



Livingston County 911 Central Dispatch / Emergency Management

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Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Comments, ET Docket No. 04-186; Introduction of Unlicensed Devices into the "White Spaces" Television Band

Dear Chairman Martin and Commissioners Copps, Adelstein, Tate and McDowell:

I am writing you today as the Livingston County 9-1-1 Central Dispatch/Emergency Management Department Director because I am concerned about the impact of the apparent rush to judgement decision to allow unlicensed, radio-frequency emitting portable devices to operate in the so-called "white spaces" of the television broadcast spectrum. These devices have the potential for further improving our quality of life and I am not opposed to the manufacture and distribution of them so long as they do not cause harmful interference to television stations and so long as they can be identified and their owners be held accountable if such interference does occur. During this time of economic challenge, I understand the pressure to get these devices to the market. However, the rush to place new technology on store shelves should not displace the common-sense need to determine whether these devices will operate as intended and not interfere with existing technology.

In the past year, Michigan residents have depended on the Emergency Alert System and local broadcasters to warn them about such life threatening-emergencies as flash floods to hazardous materials spills to severe weather to AMBER Alerts. But if interference from "white-space devices" degrades television reception our residents and visitors won't be able to depend on local broadcasters for this critical information. And if people have to spend money on dedicated warning systems that are not vulnerable to interference from white space devices, we run the risk of seeing our society divided into two classes: the informed and the uninformed.

In addition, our broadcasters have spent a lot of money upgrading their equipment to provide their audiences with the new, high-quality, digital signals. And after spending their hard-earned money on products and services like converter boxes, cable subscriptions and new televisions, viewers will be not be happy when they find out that those high-quality digital signals are subject to interference from the new white space devices and there's no way to tell them the specific source of that interference. They will surely want to know why the FCC did not take adequate steps to safeguard their ability to receive interference-free reception on their television sets.

For these reasons, I am asking the FCC to delay any vote and decision on white space devices until the public, in Michigan and other states, has the opportunity to review and comment on OET'S engineering report on which such vote depends. And in addition, the FCC should have adequate time to consider those comments, especially those related to the impact of these devices on public warning and emergency communications. While this issue involves issues of physics and technology, where physics controls, and technology cannot adequately accommodate competing spectrum uses, interference-free spectrum used by broadcasters must be considered sacred so that we do not lose lives because unlicensed, portable "white spaces" devices impede emergency information to the public.

Richard L. Winsett

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"Building Excellence through Emergency Communications"